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EPA - WOO

R.H. Smith Dist. Co., Inc.

315 E. Wine Country Rd.

P.O. Box 6

Grandview, WA 98930

TEL (509) 882-3377

FAX (509) 882-5755

November 22, 1999

Mr. Robert Cutler
USEPA
300 Desmond Dr. S. E., Suite 102
Lacey, WA 98503

Re: Facility ID# 4-260087

Dear Mr. Cutler:

I have finally received PETCO's latest inspection report from Rod Pardee. One of their technicians visited the site at 102 E. Toppenish Ave., Toppenish, on October 11, 1999 and adjusted the rectifier at that time. The soil readings appear to be satisfactory now (between -.92 and -.93).

Mr. Pardee included a copy of the inspection report from May 26, 1999, that somewhat explains the schematic I faxed to you in September. He also wrote a letter in an attempt to explain his position. I am enclosing copies of these for you.

Sincerely,

Susan K. Smith

Susan K. Smith

Encl.

INSPECTION REPORT

PETCO INCORPORATED
210 E. Albany Avenue
Kennewick Washington

Date: 10-11-99

IR Number: IR 8077 D

Page 1 of 1

Client: R.H. Smith Distributing

Client Reference Number: Toppenish C-P

PETCO Number: 08 / 8077

Reference Code/Specification: UST / CATHODIC PROTECTION

Scope of Work: INSPECTION of CATHODIC
PROTECTION SYSTEM

Report:

UPON INITIAL INSPECTION, THE COVER ON
C-P TEST PORT WAS OPEN (LOOSE), THE
POSITIVE WIRES HAD BEEN DISCONNECTED.
RE-CONNECTED POSITIVE WIRES.

RECTIFIER SETTING WAS COARSE 2 FINE 3,
13VDC AT 1/2 AMP. SOIL READINGS WERE
LOW AND RECTIFIER WAS ADJUSTED TO
COARSE 3 FINE 3, 20 VDC AT 1 AMP. SOIL
READINGS WERE -.92 and -.93.

John A. Stone

PETCO Technician

10-11-99
date

cc: Work Package, Client, Client File

INSPECTION REPORT

PETCO INCORPORATED
210 E. Albany Avenue
Kennewick Washington

Date: 5-26-99

IR Number: IR8077C

Page 1 of 1

Client: R.H. Smith DISTR.

Client Reference Number: Toppenish

PETCO Number: 08/8077

Reference Code/Specification: UST/CATHODIC PROTECTION

Scope of Work: CATHODIC PROTECTION TEST

Report:

INITIAL RECTIFIER SETTING WAS
COARSE 2 FINE 4. READINGS WERE
A LITTLE HIGH. I RE-ADJUSTED
RECTIFIER TO COARSE 2 FINE 3,
OUTPUT WAS 13 VDC AT 1/2 AMP.

SOIL READINGS WERE BETWEEN
-.84 AND -.89.

Justin A. Stone
PETCO Technician

5-26-99
date

cc: Work Package, Client, Client File

PETCO INCORPORATED

November 15, 1999

Sue Smith
R.H. Smith Distributors
315 E. Wine County Rd
P.O. Box 6
Grandview, Washington 98930

re: Toppenish site #4-260087, C-P.

Greetings,

It's been nearly a year since the installation and initial startup of the Cathodic Protection system at this site. Installation of anodes and wire was completed in late November and early December. The rectifier was energized on 12-23-98. Initial readings, after some adjustment were thought to be satisfactory. Inclement weather, holidays, and pressure to meet deadlines was a concern so interim readings were taken on 1-6-99.

These readings were listed as the first formal readings of the system. Another reading was taken on 3-4-99 and the readings were low; again adjustments were made. Readings taken by PETCO on 5-26-99 required another adjustment to achieve satisfactory levels.

The most recent readings were taken by PETCO on 10/11/99. These readings were acceptable after some minor repairs were done to the wires in the test system.

The readings probably were erratic due to the adjustments being made and the perceived necessity of allowing time for the current patterns to establish. It is quite possible and very probable that a reading at any given point might dip below the arbitrary minus (-).85 volt criteria. This established the term "Cathodically Protected" by the stroke of a pen. There are other criteria, and other opinions as to what are successful levels of "Cathodic Protection".

Minor fluctuations in readings is not uncommon nor is it any reason to be concerned. The fact that the required Ecology paperwork for this system was properly prepared and filed by a competent firm and individual is sufficient to document its proper functioning and operability.

The only standardized form I am aware of is ECY 010-160, from the Dept. of Ecology. Nowhere in the WAC do I see any specific directions on how to prepare documentation for the CP system beyond the ECY form already filed.

Finally, the information shown on PETCO #8077-003, was provided out of context and only indicates "as found conditions", a single event. The readings were corrected and improvements to the readings were made by adjustments. An internal PETCO INCORPORATED Inspection Report has been provided as explanation.

Please inform me in writing exactly what additional paperwork you need to fully resolve the issue. I am not prepared nor fully qualified to launch into a lengthy dissertation on the nuances of cathodic protection. This system design was approved by a professional engineer and corrosion specialist. Since the regulators have reduced notification to a "form" and this form has been properly prepared and submitted to them, the matter should be closed. If there are issues relating to this matter, let the charges be made in writing.

Regards,



Roderick L. Pardee
General Manager

RLP/jw

attachments: IR#8077c
IR#8077d